



# Operator Qualification Program

- ◆ Operators should have their written OQ Plan prepared by April 27, 2001.
- ◆ Operators had until October 28, 2002, to be in compliance with the implementation of the OQ Plan, to qualified all individuals performing CT.
- ◆ CSFM had until December 2005 to inspect all Operator Qualification Programs.

## OQP Cont.

- ◆ At the end of 2005, the situation was as follows:
  - 43 Operators are under CSFM Jurisdiction, all were inspected by end of December 2005, either by CSFM, DOT or jointly.





# Follow up Program Inspection:

## ◆ Following Up Inspection after Dec 2005:

- CSFM is following up with Plan and Program Inspection for **all intrastate Operators**.
- CSFM is performing Field Inspection for **all intrastate and interstate Operators**.



## **Follow up Program Inspection:**

### **◆ The Follow up Plan and Program Inspection will focus on the:**


- Compliance of the OQ Plan with Title 49, Part 195, Subpart G, including, Implementation of the OQ Plan:**
  - Correcting all the non-compliance issues noted in the Plan and Program during previous inspection,**
  - Inspection of the Qualification Records of all persons performing Covered Tasks including appropriateness of the methods used to evaluate them during qualification process.**



## Follow up Program Inspection:

- ◆ Where we are this point in time with the OQ Plan and Program Follow Up?
  - CSFM is following up with Plan and Program Inspection for **all 21 intrastate Operators**.
  - 19 Operator's Plans and Programs were followed up already (3 more to go)
  - 15 out of 19 Operator are in compliance with the OQ Rule.

# Follow up Program Inspection:

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- ◆ Where we are this point in time with the OQ Field Inspections ?
    - CSFM is performing Field Inspection for **all 43 intrastate and interstate Operators**.
    - 13 Operators were OQ Field Inspected until now, there are 30 more to go

## Follow up: Cont.

- ◆ The OQ Field inspection will be performed following DOT OQ Protocol 9 Check List.
- ◆ The OQ Field inspection will be addressing at least the followings:
  - Identification of the person performing covered task
  - Identification of the covered task performed
  - Verification of person's qualification
  - Verification if procedure is present
  - Verification of individual's AOC knowledge
  - Verification of span of control for non-OQ







# Summary Statistics: CA Intrastate

## OQ Plan and Program Violation Summary Statistics

- ◆ Violation of 195.505(a), 4 of 21 operator did not identified all applicable covered tasks
- ◆ Violation of 195.505(b),
  - 5 of 21 operators did not qualified their employees
  - 5 of 21 operators did not include AOC in the evaluation process
  - 1 of 21 operator dose not have provision for contractor and other entity
  - 1 of 21 operators plan ask for oral and job performance evaluation methods, and the operator used oral only, violating their own OQ Plan.



# Summary Statistics: Cont.

- ◆ Violation of 195.507(a) and (b),
  - 2 of 21 operator has no evaluation method on the OQ records of qualification.
  - 1 of 21 operator has no dates of evaluation on the qualification records
  - 1 of 21 operator has no contractors OQ record.
- ◆ Violation of 195.509(b), 1 of 21 do not have records of transactional qualification in 2002.



# Summary Statistics: CA

## OQ Field Violation Summary Statistics

- ◆ Violation of 195.402(a), 1 of 13 operator has no procedure available during field inspection for OQ covered task performed.
- ◆ Violation of 195.505(a), 2 of 13 operators do not have the performed CT on their list.
- ◆ Violation of 195.505(c), 1 of 13 operators do not have task specific span of control
- ◆ Violation of 195.505(b), 2 of 13 operators has use not OQ personnel to perform critical CT with zero span of control
- ◆ Violation of 195.507, 1 of 13 operators has no OQ records for the contractor's personnel.




# Contractors Issues

- ◆ CSFM does not have jurisdiction over the contractors.
- ◆ The qualification contractor personnel must be addressed in the operator's qualification plan, including qualification of personnel working under a mutual aid agreement.
- ◆ If the operator relies on a contractor's or third-party plan, it is the operator's responsibility to demonstrate that the plan(s) meet all the requirements of this subpart.



# Conclusive Word

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- ◆ If you have any questions regarding the OQ requirements, please call us at:
    - Telephone Number for CSFM Office in Lakewood is (562) 497-9100
    - Pipeline Safety Supervisor name is Chuck MacDonald
    - Pipeline Safety Engineer: Adriana Crasnean, PE.
  - ◆ We are wishing you to be in COMPLIANCE all the time.